

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13
:
Denise Robin Marshall : No. 21-11658-AMC
Debtor :

ANSWER TO MOTION OF WILMINGTON SAVINGS FUND SOCIETY, FSB FOR
RELIEF FROM THE AUTOMATIC STAY UNDER SECTION 362
AND CERTIFICATE OF SERVICE

Debtor has accepted the offer of the loan modification from
Wilmington Savings Fund Society, FSB and agrees to pay the new
mortgage amount and any other fees or monies owing by the Debtor.

WHEREFORE Debtor respectfully requests this Honorable Court
deny Movant's Motion for Relief and allow the loan modification
to proceed.

/s/ David M. Offen
David M. Offen
Attorney for Debtor

Dated: 09/17/2021

A copy of this Answer is being served on Michael J. Shavel,
Esquire, and the Chapter 13 Trustee.